



POLICY AND PROCEDURES

WV-914
Rev. 27
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Date 01/17/06

TITLE: Unreviewed Safety Question Process (USQP)

1.0 POLICY

It is the policy of the West Valley Nuclear Services Company (WVNSCO) to ensure that PROPOSED ACTIVITIES and DISCOVERIES at the West Valley Demonstration Project (WVDP) that represent conditions outside of the SAFETY BASIS (defined and documented in the SAFETY BASIS DOCUMENTS) are identified and appropriate actions taken either to modify the discovered as-found condition or to request that the Department of Energy (DOE) re-define the SAFETY BASIS per its requirements.

NOTE *The UNREVIEWED SAFETY QUESTION PROCESS is a program required to be established, and implemented by contractors responsible for hazard category 1, 2, or 3 DOE nuclear facilities in accordance with 10 CFR 830.203. In accordance with 10 CFR 830.201, 10 CFR 830.207(d) and 10 CFR 830.203(d) any proposed change (i.e., modification, addition, or deletion) to WV-914 that would invalidate this policy statement requires prior DOE approval. In Letter DW:2001:0854, DOE authorized WVNSCO to make organizational name changes or other editorial changes, provided that OH/WVDP is notified in writing within 30 days of the implementation of the change.*

NOTE *Terms defined in Section 3.0 appear in capitalized type throughout WV-914 and are intended to accurately convey a meaningful interpretation of what is meant by the terms and to enhance uniform interpretation of the UNREVIEWED SAFETY QUESTION PROCESS.*

2.0 REQUIREMENTS, REFERENCES AND FORMS

NOTE *Refer to E-Docs for the latest version of WVNSCO Controlled Documents. Refer to the S:\WPFORMS directory and/or WordPerfect templates for the latest revision of WVNSCO forms used in this procedure.*

2.1 Requirements

- 2.1.1 10 CFR 830, "Nuclear Safety Management"
- 2.1.2 DOE Guide 450.4-1B, "Integrated Safety Management System Guide."
- 2.1.3 DOE Policy 450.4, "Safety Management System Policy."
- 2.1.4 Letter DW:96:0237, R. B. Provencher to W. G. Poulson, "Ohio Field Office Policy on Safety Management," dated March 22, 1996, transmitting Memorandum OH-0668-96 (0352:96:02), J. P. Hamric to Distribution, "Ohio Field Office Policy on Safety Management," dated February 23, 1996.
- 2.1.5 Letter DW:2001:0085, E. A. Lowes to R. R. Campbell, "Implementation of Safety Basis Rule," dated February 5, 2001.

- 2.1.6 Letter DW:2001:0854, A. C. Williams to J. L. Little, "U.S. Department of Energy (DOE) Ohio Field Office (DOE-OH) Approval of WV-914, Revision 22, Draft C, 'Unreviewed Safety Question Process (USQP),' " dated December 17, 2001.

2.2 References

- 2.2.1 DOE Guide 424.1-1, "Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements."
- 2.2.2 DOE Standard DOE-STD-1027-92, Change 1 "Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports."
- 2.2.3 DOE Standard DOE-STD-3009-94, Change 2, "Preparation Guide for U. S. Department of Energy Nonreactor Nuclear Facility Documented Safety Analyses."
- 2.2.4 EP-5-003, "Approval Requests."
- 2.2.5 WV-365, "Preparation of WVDP Safety Documents."
- 2.2.6 WV-368, "Operational Readiness Determination for Startup and Restart of WVDP Facilities."
- 2.2.7 WV-906, "Radiation and Safety Committee."
- * 2.2.8 WVDP-111, "WVNSCO Quality Assurance Program."
- 2.2.9 WVDP-146, "WVDP Technical Safety Requirements"
- 2.2.10 WVDP-227, "WVDP Facility Identification and Classification Matrix."
- 2.2.11 WVDP-242, "Event Investigation and Reporting Manual."
- 2.2.12 WVDP-257, "WVNS Manual for the Preparation, Review, Approval, Distribution, and Revision of Controlled Documents."
- 2.2.13 WVDP-262, "WVNS Manual for Records Management and Storage."

2.3 FORMS

- 2.3.1 FORM WV-3306, "UNREVIEWED SAFETY QUESTION PROCESS (USQP)" (latest revision)

3.0 DEFINITIONS & ACRONYMS

Terms defined in Section 3.0 appear in capitalized type throughout WV-914 and are intended to accurately convey a meaningful interpretation of what is meant by the terms and to enhance uniform interpretation of the UNREVIEWED SAFETY QUESTION PROCESS.

- 3.1 ACCIDENT - the anticipated operational transients and postulated accidents considered in the DOCUMENTED SAFETY ANALYSES. (See DOE G 424.1-1, Appendix A, Section A.1.1.)
- 3.2 ACCIDENT ANALYSES - for the purpose of properly implementing 10 CFR 830.203, the term "accident analyses" refers to those bounding analyses selected for inclusion in a SAR. These analyses refer to derivative DESIGN BASIS ACCIDENTS only.
- 3.3 COGNIZANT MANAGER - the manager responsible for ensuring that the UNREVIEWED SAFETY QUESTION PROCESS is followed for the PROPOSED ACTIVITY or the DISCOVERY.
- 3.4 CONCURRENCE (signature) - signature from a SAFETY ANALYST REVIEWER that signifies agreement with the USQD performed and the conclusion reached by the SAFETY ANALYST.
- 3.5 DESIGN BASIS - the set of requirements that bound the design of systems, structures, and components within the facility. These design requirements include consideration of safety, plant availability, efficiency, reliability, and maintainability. Some aspects of the DESIGN BASIS are important to safety, although others are not. (See DOE-STD-3009-94, "Definitions.")
- 3.6 DESIGN BASIS ACCIDENTS - those accidents that are considered credible enough to be postulated for the purpose of establishing design and performance requirements for systems, structures, and components important to safety.
- 3.7 DISCOVERY - the identification of a difference between the facility and/or its operation and that described in the DOCUMENTED SAFETY ANALYSES or it is the identification of an error, omission, or potential inadequacy in the DOCUMENTED SAFETY ANALYSES. The DISCOVERY may result from three different sources: (1) a discrepant as-found condition; (2) an operational event or incident; or (3) new information, including discovery of an error, sometimes from an external source. (See DOE G 424.1-1, Section 2.4.)
- 3.8 DOCUMENTED SAFETY ANALYSIS (DSA) - a documented analysis of the extent to which a NUCLEAR FACILITY can be operated safely with respect to workers, the public, and the environment, including a description of the conditions, safe boundaries, and HAZARD CONTROLS that provide the basis for ensuring safety. DOCUMENTED SAFETY ANALYSES consist of SARs, TSRs, and SMPs. DOCUMENTED SAFETY ANALYSES have been approved by DOE. (See 10 CFR 830.3.)
- 3.9 EQUIPMENT IMPORTANT TO SAFETY - equipment whose function can impact safety either directly or indirectly. "EQUIPMENT IMPORTANT TO SAFETY" is the same as "SAFETY STRUCTURES, SYSTEMS, AND COMPONENTS."
- 3.10 HAZARD - a source of danger (i.e., material, energy source, or operation) with the potential to cause illness, injury, or death to a person or damage to a facility or to the environment (without regard to the likelihood or credibility of accident scenarios or consequence mitigation). (See 10 CFR 830.3.)

- 3.11 HAZARD CONTROLS - measures to eliminate, limit, or mitigate HAZARDS to workers, the public, or the environment, including: (1) physical, design, structural, and engineering features; (2) SAFETY STRUCTURES, SYSTEMS, AND COMPONENTS; (3) SAFETY MANAGEMENT PROGRAMS; (4) TECHNICAL SAFETY REQUIREMENTS; and (5) other controls necessary to provide adequate protection from HAZARDS. (See 10 CFR 830.3.)
- 3.12 MAJOR MODIFICATION - a PROPOSED ACTIVITY that, if implemented, would be an UNREVIEWED SAFETY QUESTION. (Based upon 10 CFR 830.3, 10 CFR 830.203(e), and 10 CFR 830.207(d).)
- 3.13 MARGIN OF SAFETY - the range between the TSR limits and the acceptance limit reviewed and approved by DOE.
- 3.14 NON-REACTOR NUCLEAR FACILITY - a facility, activity, or operation that involves, or will involve, radioactive and/or fissionable materials in such form and quantity that a nuclear or a nuclear explosive HAZARD potentially exists to workers, the public, or the environment, but does not include accelerators and their operations and does not include activities involving only incidental use and generation of radioactive materials or radiation such as check and calibration sources, use of radioactive sources in research and experimental and analytical laboratory activities, electron microscopes, and X-ray machines. (See 10 CFR 830.3.)
- 3.15 NUCLEAR FACILITY - a reactor or a NON-REACTOR NUCLEAR FACILITY where an activity is conducted for or on behalf of DOE and includes any related area, structure, facility, or activity to the extent necessary to ensure proper implementation of the requirements established by 10 CFR 830. (See 10 CFR 830.3.)
- 3.16 PROPOSED ACTIVITY - any proposed change, test, or experiment being evaluated. A "change" includes a new facility; a new system; a modification of, an addition to, or the deletion of an existing facility; a modification to, an addition to, or the deletion of an existing system; a new procedure or work instruction; and a revision to, a field change to, or the deletion of an existing procedure or work instruction. A "change" covers all of the aforementioned items (irrespective of whether the "change" is for one-time use, for temporary use, or for permanent use) and must have a USQ SCREEN and, if appropriate, a USQD.
- 3.17 RADIATION AND SAFETY COMMITTEE (R&SC) - a group of individuals appointed by the WVNSCO President to provide objective and independent review of safety-related operations, systems, and activities and to function in an advisory capacity to the line organization and the WVNSCO President. (See WV-906)
- 3.18 SAFETY ANALYSIS - a documented process: (1) to provide systematic identification of HAZARDS within a given DOE operation; (2) to describe and analyze the adequacy of measures taken to eliminate, control, or mitigate identified HAZARDS; and (3) to analyze and evaluate potential ACCIDENTS and their associated risks. (See DOE-STD-3009-94, "Definitions.")

- 3.19 SAFETY ANALYSIS REPORT (SAR) - a report that documents the adequacy of SAFETY ANALYSIS to ensure that the facility can be constructed, operated, maintained, shut down, and decommissioned safely and in compliance with applicable laws and regulations. (See DOE-STD-3009-94, "Definitions.") 10 CFR 830 addresses two types of SARs: Preliminary SAFETY ANALYSIS REPORTS (PSARs) in 10 CFR 830.206; and Final SAFETY ANALYSIS REPORTS (FSARs) in 10 CFR 830.204. SARs are part of the DOCUMENTED SAFETY ANALYSES and are listed in Attachment C.
- 3.20 SAFETY ANALYST - an individual, identified by the NS&EM Manager, who has technical responsibility for completing a USQD (Sections V, VI, and VII of USQP FORM WV-3306).
- 3.21 SAFETY ANALYST REVIEWER - an individual, identified by the NS&EM Manager, who has independent responsibility to review a USQD (Sections V, VI, and VII of USQP FORM WV-3306).
- 3.22 SAFETY BASIS - the DOCUMENTED SAFETY ANALYSIS and HAZARD CONTROLS, along with the NRC and DOE SAFETY EVALUATION REPORTS, that provide reasonable assurance that a DOE NUCLEAR FACILITY can be operated safely in a manner that adequately protects workers, the public, and the environment. (See 10 CFR 830.3 and DOE G 424.1-1, Section 1.)
- 3.23 SAFETY BASIS DOCUMENTS - the collection of documents consisting of the DOCUMENTED SAFETY ANALYSES (SARs, TSRs, and SMPs), Nuclear Regulatory Commission (NRC) SAFETY EVALUATION REPORTS (SERs), and Department of Energy (DOE) SAFETY EVALUATION REPORTS (SERs). Use of this term implies DOE approval of these documents. NRC SERs are considered to be DOE-approved upon transmittal by DOE to WVNSCO. (See DOE G 424.1-1, Section 1.)
- 3.24 SAFETY-CLASS STRUCTURES, SYSTEMS, AND COMPONENTS (SAFETY-CLASS SSCs) - the structures, systems, or components (SSCs), including portions of process systems, whose preventive or mitigative function is necessary to limit radioactive hazardous material exposure to the public, as determined from SAFETY ANALYSES. (See 10 CFR 830.3.)
- 3.25 SAFETY EVALUATION REPORT (SER) - the report prepared by DOE and/or the NRC to document (1) The sufficiency of the DOCUMENTED SAFETY ANALYSIS for a Hazard Category 1, 2, or 3 DOE NUCLEAR FACILITY; (2) The extent to which a contractor has satisfied the requirements of 10 CFR 830 Subpart B, "Safety Basis Requirements"; and (3) The basis for approval by DOE of the SAFETY BASIS for the facility, including any conditions for approval. SERs are part of the SAFETY BASIS DOCUMENTS and are listed in Attachment D. (See 10 CFR 830.3.)
- 3.26 SAFETY MANAGEMENT PROGRAM (SMP) - a program designed to ensure a facility is operated in a manner that adequately protects workers, the public, and the environment by covering a topic such as: quality assurance; maintenance of safety systems; personnel training; conduct of operations; inadvertent criticality protection; emergency preparedness; fire protection; waste management; or radiological protection. The SAFETY MANAGEMENT PROGRAMS that are part of the DOCUMENTED SAFETY ANALYSES are identified in WVDP-146. (See 10 CFR 830.3.)

- 3.27 SAFETY-SIGNIFICANT STRUCTURES, SYSTEMS, AND COMPONENTS (SAFETY-SIGNIFICANT SSCs) - the structures, systems, and components (SSCs) which are not designated as SAFETY-CLASS SSCs, but whose preventive or mitigative function is a major contributor to defense in depth and/or worker safety as determined from SAFETY ANALYSES. (See 10 CFR 830.3.)
- 3.28 SAFETY STRUCTURES, SYSTEMS, AND COMPONENTS (SAFETY SSCs) - both SAFETY-CLASS SSCs and SAFETY-SIGNIFICANT SSCs. (See 10 CFR 830.3.)
- 3.29 SHALL - indicates a requirement.
- 3.30 TECHNICAL SAFETY REQUIREMENTS (TSRs) - the limits, controls, and related actions that establish the specific parameters and requisite actions for safe operation of a NUCLEAR FACILITY and include, as appropriate for the work and the HAZARDS identified in the DOCUMENTED SAFETY ANALYSIS for the facility: safety limits, operating limits, surveillance requirements, administrative and management controls, use and application provisions, and design features, as well as a bases appendix. TSRs are part of the DOCUMENTED SAFETY ANALYSES and are listed in Attachment C. (See 10 CFR 803.3.)
- 3.31 UNREVIEWED SAFETY QUESTION (USQ) - a situation where (1) The probability of the occurrence or the consequences of an ACCIDENT or the malfunction of EQUIPMENT IMPORTANT TO SAFETY previously evaluated in the DOCUMENTED SAFETY ANALYSIS could be increased; (2) The possibility of an ACCIDENT or malfunction of a different type than any evaluated previously in the DOCUMENTED SAFETY ANALYSIS could be created; (3) A MARGIN OF SAFETY could be reduced; or (4) The DOCUMENTED SAFETY ANALYSIS may not be bounding or may be otherwise inadequate. (See 10 CFR 830.3.)
- 3.32 UNREVIEWED SAFETY QUESTION DETERMINATION (USQD) - the mechanism for determining and documenting whether DOE approval is required prior to implementing the PROPOSED ACTIVITY or whether the DISCOVERY involves operation outside of the SAFETY BASIS. The USQD documentation consists of Sections V, VI, and VII of USQP FORM WV-3306. (See Attachment B.)
- 3.33 USQD EXCLUSION - the record permitted by DOE G 424.1-1 to document the PROPOSED ACTIVITY that will exclude future revisions (including cancellation) of a specified procedure or type of procedure change (e.g., a new-type revision, as defined in WVDP-257) from the USQ PROCESS. This document records the scope of the evaluation and the logic for determining that an UNREVIEWED SAFETY QUESTION would not exist and that any future revisions of the specified procedure can not and will not affect the SAFETY BASIS. USQD EXCLUSIONS for PROPOSED ACTIVITIES that involve physical modifications to a facility are not permitted. (See DOE G 424.1-1, Section 3.2.)
- 3.34 USQD ORIGINATOR - an individual, assigned by the COGNIZANT MANAGER, who has sole responsibility for determining whether or not a USQD is required.
- 3.35 UNREVIEWED SAFETY QUESTION PROCESS (USQP) - the mechanism for keeping the SAFETY BASIS current by reviewing potential UNREVIEWED SAFETY QUESTIONS, reporting UNREVIEWED SAFETY QUESTIONS to DOE, and obtaining approval from DOE prior to taking any action on a PROPOSED ACTIVITY that, if implemented, would be an UNREVIEWED SAFETY QUESTION. (See 10 CFR 830.3.)

- 3.36 UNREVIEWED SAFETY QUESTION PROCESS (USQP) FORM WV-3306 - the record (including supporting documentation) required by 10 CFR 830.203(d) to document that the PROPOSED ACTIVITY or the DISCOVERY has been reviewed to determine whether the DISCOVERY is a USQ or whether the PROPOSED ACTIVITY, if implemented, would be a USQ. An acceptable equivalent alternative record of decision for the USQ SCREEN portion of USQP FORM WV-3306 is provided in the definition of "USQ SCREEN."
- 3.37 USQ SCREEN - the documented determination of whether the PROPOSED ACTIVITY or the DISCOVERY requires a USQD. Completion of Sections II, III (optional), and IV of USQP FORM WV-3306 provides the documentation that a USQ SCREEN has been performed. An acceptable equivalent alternative record of decision is for the implementing procedure to contain the following:

Is a USQD (USQP FORM WV-3306, Sections V, VI, and VII) required? Yes ____ No ____

(USQD ORIGINATOR or SAFETY
ANALYST Signature)

(Printed)

(Date)

If Yes, attach the completed USQD (USQP FORM WV-3306, Sections V, VI, and VII).

(See 10 CFR 830.203(d).)

4.0 GENERAL INFORMATION

- 4.1 This procedure applies to all PROPOSED ACTIVITIES and DISCOVERIES that have the potential to affect the WVDP's DOCUMENTED SAFETY ANALYSES. WV-914 implements the requirements of 10 CFR 830.203, "UNREVIEWED SAFETY QUESTION PROCESS," and provides the process for screening and evaluating activities to determine whether the DISCOVERY is an UNREVIEWED SAFETY QUESTION (USQ) or whether the PROPOSED ACTIVITY, if implemented, would be a USQ. (See 10 CFR 830.203(a).) The purpose of the USQP is to determine whether DOE approval of DOCUMENTED SAFETY ANALYSES (SARs, TSRs, and SMPs) and/or revisions to DOCUMENTED SAFETY ANALYSES is required prior to implementing the PROPOSED ACTIVITY or whether the DISCOVERY is an UNREVIEWED SAFETY QUESTION (USQ). (See DOE G 424.1-1, Section 1.)
- 4.2 Prior to performing a USQ SCREEN for the PROPOSED ACTIVITY, it is important to have already determined that the PROPOSED ACTIVITY can be safely performed. If it is subsequently determined that the PROPOSED ACTIVITY would not be safe, the activity **SHALL** be modified to make it safe or it **SHALL** be canceled.
- 4.3 After it is determined that the PROPOSED ACTIVITY would be safe, a determination **SHALL** be made, using WV-914, as to whether the PROPOSED ACTIVITY would be a USQ. If it is determined that the PROPOSED ACTIVITY would not be a USQ, then WVNSCO may implement the PROPOSED ACTIVITY (provided all other requirements are met), provided no modification, addition or deletion is to be made to the set of TSRs.

- 4.4 WV-365 provides the process for the preparation, review, and approval of SARs and TSRs. In addition, WV-906 provides information on the responsibilities of the RADIATION AND SAFETY COMMITTEE (R&SC). Thus, an understanding of WV-365 and WV-906 is needed for completing some actions required under WV-914.
- 4.5 Evaluations of PROPOSED ACTIVITIES or DISCOVERIES performed under WV-914 are required as actions within the WVNSCO procedures listed in Attachment A. WV-914 provides the directions for "how" to complete the USQ SCREEN and, if required, the USQD associated with USQP FORM WV-3306. The procedures listed in Attachment A provide the requirements for "when" to complete a USQ SCREEN.
- 4.6 If the PROPOSED ACTIVITY requires that a change (i.e., a modification, addition, or deletion) be made to the set of TSRs, then DOE approval may be required prior to implementing the PROPOSED ACTIVITY. TSR changes **SHALL** be processed per WV-365.
- 4.7 If the PROPOSED ACTIVITY would be a USQ, then the relevant DOCUMENTED SAFETY ANALYSIS **SHALL** be revised per WV-365 prior to implementing the PROPOSED ACTIVITY. The PROPOSED ACTIVITY may be modified and, if so, the resulting PROPOSED ACTIVITY **SHALL** be re-evaluated to determine whether the revised PROPOSED ACTIVITY would be a USQ. If a modification to the original PROPOSED ACTIVITY is not desired, the PROPOSED ACTIVITY may be canceled. (See DOE G 424.1-1, Section 3.1.)
- 4.8 For the DISCOVERY, WV-914 **SHALL not** be construed as prohibiting any individual at the WVDP from bringing the matter to the attention of management and requesting that the COGNIZANT MANAGER initiate the USQ PROCESS. In this case, WV-914 is self-implementing, because there is no other implementing procedure identified in Attachment A to cover this situation.
- 4.9 The NS&EM Manager is responsible for WV-914 and **SHALL**, upon request, assist any individual at the WVDP in the use of this procedure and completion of the USQ PROCESS.
- 4.10 10 CFR 830 and DOE G 424.1-1 contain requirements, guidance, and information that **SHALL** be used, as necessary, in the USQ PROCESS. Flow charts for the USQ PROCESS are provided in Attachments E and F.

5.0 PROCEDURE

5.1 Preliminary Actions

- 5.1.1 When specified by the implementing procedures listed in Attachment A, the USQ PROCESS **SHALL** be followed.
- A. For the DISCOVERY, the COGNIZANT MANAGER **SHALL** impose interim operational restrictions as required to place or maintain the facility in a safe condition until an evaluation of the safety of the DISCOVERY situation is completed. (See 10 CFR 830.203(g)(1).)
- B. For the DISCOVERY, the COGNIZANT MANAGER **SHALL** report to DOE as required per WVDP-242. (See 10 CFR 830.203(g)(2) and 10 CFR 830.203(g)(3).)

- C. For the PROPOSED ACTIVITY, the COGNIZANT MANAGER **SHALL** ensure that WV-914 is implemented for the final version of the PROPOSED ACTIVITY, after all reviews have been performed and all comments have been resolved and incorporated.
- D. If the COGNIZANT MANAGER, at any time and for any reason, decides to modify or terminate the PROPOSED ACTIVITY, then actions under WV-914 may also be terminated. In the case of a modification, WV-914 **SHALL** be followed for the modified PROPOSED ACTIVITY.

5.2 Performing a USQ SCREEN

- 5.2.1 The COGNIZANT MANAGER **SHALL** ensure that the DISCOVERY or the PROPOSED ACTIVITY (identified per the procedures listed in Attachment A) is evaluated by having a USQ SCREEN and, if necessary, a USQD performed. (See 10 CFR 830.203(d) and 10 CFR 830.203(g)(3).)
 - A. The COGNIZANT MANAGER **SHALL** assign a USQD ORIGINATOR to perform a USQ SCREEN. The list of personnel trained to be USQD ORIGINATORS is available on the WVNSCO Intranet.
 - B. The USQD Originator **SHALL** be knowledgeable of site operations through a combination of experience and technical training, for being familiar with 10 CFR 830.203, WV-914, and relevant SAFETY BASIS DOCUMENTS.
- 5.2.2 The USQD ORIGINATOR **SHALL** complete Section I of USQP FORM WV-3306.
- 5.2.3 The USQD ORIGINATOR **SHALL** answer the USQ SCREEN questions in Section II of USQP FORM WV-3306 or the equivalent alternative record of decision as defined under "USQ SCREEN."
 - A. If the answer to Section II.B.4 of USQP FORM WV-3306 is "Yes" or "Maybe," then DOE approval of a TSR change may be required prior to implementing the PROPOSED ACTIVITY. See WV-365 for details of the approval process.
 - B. If any of the answers to the questions in Section II.A or Section II.B of USQP FORM WV-3306 is "Yes" or "Maybe," then a USQD is required. (See DOE G 424.1-1, Appendix B, Section B.7.)
 - 1) The USQD ORIGINATOR **SHALL** indicate the conclusion that a USQD is required in Section IV.A.2 of USQP FORM WV-3306. (See 10 CFR 830.203(d).)
 - 2) The USQD ORIGINATOR **SHALL** sign Section IV.B.1 of USQP FORM WV-3306.

- 3) An acceptable equivalent alternative record of decision is for the USQD ORIGINATOR to indicate "Yes" to the question, "Is a USQD (USQP FORM WV-3306, Sections V, VI, and VII) required?" and to sign when the implementing procedure contains the equivalent alternative record of decision as defined under "USQ SCREEN." (See 10 CFR 830.203(d).)
 - 4) The COGNIZANT MANAGER **SHALL** continue with Section 5.3.1.
- C. If all of the answers to the questions in Section II.A or II.B of USQP FORM WV-3306 are "No," then the USQD ORIGINATOR has determined that the DISCOVERY is not a USQ or that the PROPOSED ACTIVITY, if implemented, would not be a USQ and does not require a USQD. Use of Section III of USQP FORM WV-3306 is optional.
- 1) The USQD ORIGINATOR **SHALL** indicate the conclusion in Section IV.A.1 of USQP FORM WV-3306 that the DISCOVERY or the PROPOSED ACTIVITY does not require a USQD.
 - 2) The USQD ORIGINATOR **SHALL** sign Section IV.B.1 of USQP FORM WV-3306.
 - 3) An acceptable equivalent alternative record of decision is for the USQD ORIGINATOR to indicate "NO" to the question, "Is a USQD (USQP FORM WV-3306, Sections V, VI, and VII) required?" and to sign when the implementing procedure contains the equivalent alternative record of decision as defined under "USQ SCREEN."
 - 4) The COGNIZANT MANAGER **SHALL** continue with Section 5.7.1.

5.3 Performing a USQD

- 5.3.1 The COGNIZANT MANAGER **SHALL** ensure that a USQD is performed by a SAFETY ANALYST for the DISCOVERY or the PROPOSED ACTIVITY that is identified as requiring a USQD in Section IV.A.2 of USQP FORM WV-3306 or in the equivalent alternative record of decision defined under "USQ SCREEN" as stated in the implementing procedure. The list of personnel trained to be SAFETY ANALYSTS is available on the WVNSCO Intranet.
- A. The SAFETY ANALYST **SHALL** be knowledgeable of site operations through a combination of experience and technical training, for being familiar with 10 CFR 830.203, WV-914, and relevant SAFETY BASIS DOCUMENTS.
 - B. The USQD Originator will provide assistance to the SAFETY ANALYST, if requested.

- 5.3.2 The SAFETY ANALYST **SHALL** contact Records & Configuration/Document Control to obtain a USQD number which will be used to uniquely identify the USQD for work control and use in the annual USQD report to DOE.
- 5.3.3 The SAFETY ANALYST **SHALL** review SAFETY BASIS DOCUMENTS (Attachments C and D) as they relate to the DISCOVERY or the PROPOSED ACTIVITY.
 - A. The SAFETY ANALYST **SHALL**, as appropriate, review previously approved changes (including their associated USQDs), changes in progress, and the interrelationship between the DISCOVERY or the PROPOSED ACTIVITY and other equipment, systems, or processes.
 - B. The SAFETY ANALYST **SHALL** record pertinent information (e.g., content and references) used to support the basis for answers and conclusions reached in performing the USQD.
- 5.3.4 The SAFETY ANALYST **SHALL** perform the USQD.
 - A. The SAFETY ANALYST **SHALL** answer the seven questions contained in USQP FORM WV-3306, Section V.
 - B. The SAFETY ANALYST **SHALL** document the basis for the answers to the Section V questions in Section VI, including additional pages as needed. Proper documentation should answer the question: "How is the DISCOVERY or PROPOSED ACTIVITY addressed in the DOCUMENTED SAFETY ANALYSES and where can one look to demonstrate that fact (i.e., which section of which SAR, TSR, etc.)?" (See DOE G 424.1-1, Appendix A, Section A.2.)
 - C. If all of the answers to the seven questions in Section V are "No," then the SAFETY ANALYST has determined that the DISCOVERY is not a USQ, or the PROPOSED ACTIVITY, if implemented, would not be a USQ.
 - 1) The SAFETY ANALYST **SHALL** indicate this conclusion in Section VII.A.1 of USQP FORM WV-3306.
 - 2) The SAFETY ANALYST **SHALL** sign Section VII.B.1 of USQP FORM WV-3306.
 - 3) The SAFETY ANALYST **SHALL** give the USQP FORM WV-3306 with a copy of any supporting documentation (calculations, data, notes, conclusions, etc.) to the SAFETY ANALYST REVIEWER for CONCURRENCE. (See DOE G 424.1-1, Section 3.1.)
 - D. If any of the answers to the seven questions in Section V is "Yes" or "Maybe," then the SAFETY ANALYST has determined that the DISCOVERY is a potential USQ or that the PROPOSED ACTIVITY, if implemented, would be a USQ.

- 1) The SAFETY ANALYST **SHALL** indicate this conclusion in Section VII.A.2 or VII.A.3 of USQP FORM WV-3306, as appropriate.
- 2) The SAFETY ANALYST **SHALL** sign Section VII.B.1 of USQP FORM WV-3306.
- 3) The SAFETY ANALYST **SHALL** give USQP FORM WV-3306 and a copy of any supporting documentation (calculations, data, notes, conclusions, etc.) to the assigned SAFETY ANALYST REVIEWER for CONCURRENCE. (See DOE G 424.1-1, Section 3.1.)

5.4 Performing a USQD Review

- 5.4.1 The COGNIZANT MANAGER **SHALL** ensure that USQP FORM WV-3306 is independently reviewed by a SAFETY ANALYST REVIEWER. The Records & Configuration/Document Control Manager maintains a list of personnel trained to be SAFETY ANALYST REVIEWERS; this list is available on the WVNSCO Intranet.
 - A. The SAFETY ANALYST REVIEWER **SHALL** be knowledgeable of site operations through a combination of experience and technical training, for being familiar with 10 CFR 830.203, WV-914, and relevant SAFETY BASIS DOCUMENTS.
- 5.4.2 The SAFETY ANALYST REVIEWER **SHALL** examine the documentation, research data, calculations, answers, and justifications as documented in Sections V, VI, and VII of USQP FORM WV-3306.
- 5.4.3 The SAFETY ANALYST REVIEWER **SHALL** independently verify the reasonableness of the SAFETY ANALYST's conclusion.
- 5.4.4 The SAFETY ANALYST REVIEWER **SHALL** document and inform the SAFETY ANALYST of any disagreement with the conclusion.
- 5.4.5 The SAFETY ANALYST and the SAFETY ANALYST REVIEWER **SHALL** resolve comments and concerns in order to arrive at a consensus opinion regarding the DISCOVERY or the PROPOSED ACTIVITY.
- 5.4.6 The SAFETY ANALYST REVIEWER **SHALL** sign USQP FORM WV-3306 in Section VII.B.2.
- 5.4.7 The SAFETY ANALYST REVIEWER **SHALL** return the completed USQP FORM WV-3306 to the USQD ORIGINATOR.
- 5.4.8 The USQD ORIGINATOR **SHALL** return the completed USQP FORM WV-3306 to the COGNIZANT MANAGER.
- 5.4.9 The COGNIZANT MANAGER **SHALL** ensure disposition of the completed USQP FORM WV-3306 as follows:
 - A. For the PROPOSED ACTIVITY that would not be a USQ:

- 1) The completed USQP FORM WV-3306 **SHALL** be attached to the documentation required by the implementing procedure (i.e., one of the procedures listed in Attachment A).
- 2) The COGNIZANT MANAGER **SHALL** continue with Section 5.7.1.

B. For the DISCOVERY that is not a USQ:

- 1) The completed USQP FORM WV-3306 **SHALL** be attached to the documentation required by the implementing procedure (i.e., one of the procedures listed in Attachment A); and
- 2) If interim operational restrictions had been required during the USQ PROCESS, then the COGNIZANT MANAGER **SHALL** ensure that an evaluation of the safety of the DISCOVERY situation is prepared and submitted to DOE prior to removing any interim operational restrictions. (See 10 CFR 830.203(g)(4).)
- 3) The COGNIZANT MANAGER **SHALL** continue with Section 5.7.1.

C. For the PROPOSED ACTIVITY that, if implemented, would be a USQ:

- 1) If the COGNIZANT MANAGER, at any time and for any reason, decides to modify or terminate a particular PROPOSED ACTIVITY, then actions under WV-914 may also be terminated. In the case of a modification, WV-914 **SHALL** be followed for the modified PROPOSED ACTIVITY. (See DOE G 424.1-1, Section 3.1.)
- 2) The COGNIZANT MANAGER **SHALL** ensure that the USQP FORM WV-3306 is attached to the documentation required by the implementing procedure (i.e., one of the procedures listed in Attachment A).
- 3) The COGNIZANT MANAGER **SHALL** propose a revision to the relevant DOCUMENTED SAFETY ANALYSIS per the requirements of WV-365.
- 4) Prior to implementing the PROPOSED ACTIVITY, the COGNIZANT MANAGER **SHALL** obtain approval from the appropriate DOE approval authority for the revised DOCUMENTED SAFETY ANALYSIS per the requirements of WV-365. (See 10 CFR 830.203(e).)
- 5) The COGNIZANT MANAGER **SHALL** continue with Section 5.7.1.

D. For the DISCOVERY that is a potential USQ:

- 1) The COGNIZANT MANAGER **SHALL** ensure that the USQP FORM WV-3306 is provided to the NS&EM Manager for transmittal to the R&SC for further review, in accordance with WV-906.
- 2) The COGNIZANT MANAGER **SHALL** ensure that interim operational restrictions, as appropriate, are maintained while the DISCOVERY situation undergoes further review. (See 10 CFR 830.203(g)(1).)

5.5 R&SC Review of the USQD

- 5.5.1 The NS&EM Manager **SHALL** transmit USQP FORM WV-3306 to the R&SC for further review, in accordance with WV-906.
- 5.5.2 The NS&EM Manager **SHALL** ensure that R&SC members receive a briefing on 10 CFR 830.203 and WV-914 prior to voting on issues associated with completion of USQP FORM WV-3306.
- 5.5.3 The R&SC **SHALL** review USQP FORM WV-3306 for the DISCOVERY. As it deems necessary, the R&SC may request additional information from other personnel (e.g., COGNIZANT MANAGER, USQD ORIGINATOR, SAFETY ANALYST, and SAFETY ANALYST REVIEWER).
- 5.5.4 The R&SC **SHALL** determine whether the DISCOVERY is a probable USQ.

A. Upon determination that the DISCOVERY is not a USQ:

- 1) The R&SC Chairman **SHALL** indicate the R&SC's conclusion in Section VIII.A.1 of USQP FORM WV-3306.
- 2) The R&SC Chairman **SHALL** sign Section VIII.B of USQP FORM WV-3306.
- 3) The R&SC Chairman **SHALL** refer the issue back to the COGNIZANT MANAGER for corrective action.
- 4) The COGNIZANT MANAGER **SHALL** continue with Section 5.4.9.B.

B. Upon determination that the DISCOVERY is a probable USQ:

- 1) The R&SC Chairman **SHALL** indicate the R&SC's conclusion in Section VIII.A.2 of USQP FORM WV-3306.
- 2) The R&SC Chairman **SHALL** sign Section VIII.B of USQP FORM WV-3306.
- 3) The R&SC Chairman **SHALL** immediately notify the President of the R&SC's conclusion.
- 4) The R&SC **SHALL** recommend that a report to DOE be made, if required per WVDP-242. (See 10 CFR 830.203(g)(2) and 10 CFR 830.203(g)(3).)

- 5) The R&SC **SHALL** offer suggestions for changing the facility, its operations, or any interim operational restrictions in order to ensure safe conditions at all times. (See 10 CFR 830.203(g)(1).)
- 6) The R&SC **SHALL** forward USQP FORM WV-3306 and supporting documentation to the President.

5.6 Presidential Review of the USQD

5.6.1 The NS&EM Manager **SHALL** ensure that the President receives a briefing on 10 CFR 830.203 and WV-914 prior to making a final decision associated with completion of Section IX of USQP FORM WV-3306.

5.6.2 The President **SHALL** determine whether an UNREVIEWED SAFETY QUESTION exists.

A. The President **SHALL** review the R&SC's recommendation regarding the DISCOVERY that is a probable USQ.

B. If the President disagrees with the R&SC's recommendation:

- 1) The President **SHALL** complete Section IX.A.1 of USQP FORM WV-3306.
- 2) The President **SHALL** sign Section IX.B of USQP FORM WV-3306.
- 3) The President **SHALL** refer the issue back to the R&SC for further action, as appropriate.
- 4) The R&SC **SHALL** continue with Section 5.5.4.A.

C. If the President agrees with the R&SC's recommendation:

- 1) The President **SHALL** declare that the DISCOVERY is an UNREVIEWED SAFETY QUESTION in Section IX.A.2 of USQP FORM WV-3306.
- 2) The President **SHALL** document the time and date in Section IX.A.2 of USQP FORM WV-3306.
- 3) The President **SHALL** sign Section IX.B of USQP FORM WV-3306.
- 4) The President **SHALL** ensure that a report is made to DOE, if required per WVDP-242. (See 10 CFR 830.203(g)(2) and 10 CFR 830.203(g)(3).)

- 5) If interim operational restrictions had been required during the USQ PROCESS, then the COGNIZANT MANAGER **SHALL** ensure that an evaluation of the safety of the DISCOVERY situation is prepared and submitted to DOE prior to removing any interim operational restrictions. (See 10 CFR 830.203(g)(4) and DOE G 424.1-1, Appendix B, Section B.6.)

5.7 Documenting the USQP

- 5.7.1 The COGNIZANT MANAGER **SHALL** ensure that the completed USQP FORM WV-3306 is submitted to Records & Configuration/Document Control as a record. (See DOE G 424.1-1, Section 3.4.) Those portions of USQP FORM WV-3306 that are not required to be filled out per WV-914 may be omitted from the documentation. For example, if Section IV of USQP FORM WV-3306 indicates that the PROPOSED ACTIVITY does not require a USQD, then the pages of USQP FORM WV-3306 that contain blank Sections V through IX may be discarded.
 - A. If the USQ PROCESS was performed to fulfill a requirement contained in one of the implementing procedures listed in Attachment A (except for WV-914), then the USQP FORM WV-3306 **SHALL** be attached as a record to the appropriate documentation required by the implementing procedure.
 - B. If the USQ PROCESS was performed as a result of WV-914 being self-implementing for the DISCOVERY per Section 4.8 and the conclusion is that a USQ does not exist, then the completed USQP FORM WV-3306 **SHALL** be transmitted to Records & Configuration/Document Control via formal internal correspondence, with a copy being provided to the NS&EM Manager.
 - C. If the DISCOVERY involved a situation for which interim operational restrictions were required, then the COGNIZANT MANAGER **SHALL** ensure that an evaluation of the safety of the DISCOVERY situation is prepared and submitted to DOE prior to removing any interim operational restrictions. (See 10 CFR 830.203(g)(4) and DOE G 424.1-1, Appendix B, Section B.6.)
 - D. The completed USQP FORM WV-3306 **SHALL** be considered "issued" when the document to which it is attached is approved.
- 5.7.2 The COGNIZANT MANAGER **SHALL** ensure that any changes that are needed as a result of any USQD or any action taken are incorporated into the relevant DOCUMENTED SAFETY ANALYSIS, per WV-365. (See 10 CFR 830.202(c)(1).)

5.8 Documenting a USQD EXCLUSION

Per DOE G 424.1-1, Section 3.2, a "categorical exclusion" is permitted for changes to specified procedures and types of procedure changes (e.g., revisions, as defined in WVDP-257) under certain circumstances as described in the following sections. Hereafter, a "categorical exclusion" will be referred to as a "USQD EXCLUSION" to avoid confusion with the National Environmental Policy Act (NEPA) terminology "categorical exclusion." USQD EXCLUSIONS for PROPOSED ACTIVITIES that involve physical modifications to a facility **SHALL not** be permitted.

- 5.8.1 The COGNIZANT MANAGER **SHALL** ensure creation of a USQD EXCLUSION by following WV-914 for the PROPOSED ACTIVITY. Section I.C of USQP FORM WV-3306 should contain a statement such as:

"This PROPOSED ACTIVITY is a USQD EXCLUSION for all future revisions (including cancellation) of Procedure WV-xxx. Following approval, no additional USQP FORM WV-3306 is needed for future revisions to this procedure."

- 5.8.2 The COGNIZANT MANAGER **SHALL** recognize that a USQD EXCLUSION must support the conclusion that an UNREVIEWED SAFETY QUESTION would not exist; that the USQD EXCLUSION serves to exclude all future revisions (including cancellation) of the specified procedure or all future uses of the type of procedure change from the USQ PROCESS; and that any future revisions of the specified procedure or type of procedure change can not and will not affect the SAFETY BASIS.

- 5.8.3 Only a SAFETY ANALYST **SHALL** serve as the USQD ORIGINATOR for a USQD EXCLUSION.

- 5.8.4 After the USQD EXCLUSION is completed on USQP FORM WV-3306, the COGNIZANT MANAGER **SHALL** ensure that it is transmitted to Records & Configuration/Document Control via internal correspondence so that it will be available for future reference.

5.9 USQ PROCESS Training Program

- 5.9.1 COGNIZANT MANAGERS **SHALL** identify to the NS&EM Manager those personnel who are to receive training to be USQD ORIGINATORS.

- 5.9.2 The NS&EM Manager **SHALL** identify SAFETY ANALYSTS and SAFETY ANALYST REVIEWERS, taking into consideration the guidance of DOE G 424.1-1, Section 3.5.

- 5.9.3 The NS&EM Manager **SHALL** ensure that training for USQD ORIGINATORS, SAFETY ANALYSTS, and SAFETY ANALYST REVIEWERS is established and updated to implement the requirements of 10 CFR 830.203 and, as appropriate, the guidance of DOE G 424.1-1, Section 3.5.

- 5.9.4 Requalification training for USQD ORIGINATORS, SAFETY ANALYSTS, and SAFETY ANALYST REVIEWERS is typically performed within two years from the previous training, but **SHALL** not exceed 28 months from the date of the previous training.
- 5.9.5 The Records & Configuration/Document Control Manager **SHALL** maintain the list of personnel trained to be USQD ORIGINATORS, SAFETY ANALYSTS, and SAFETY ANALYST REVIEWERS.
- 5.9.6 The NS&EM Manager **SHALL** ensure that R&SC members receive a briefing on 10 CFR 830.203 and WV-914 prior to voting on issues associated with completion of USQP FORM WV-3306.
- 5.9.7 The NS&EM Manager **SHALL** ensure that the President receives a briefing on 10 CFR 830.203 and WV-914 prior to making a final decision associated with completion of Section IX of USQP FORM WV-3306.

5.10 Annual USQD Report to DOE

- 5.10.1 The NS&EM Manager **SHALL** annually submit to OH/WVDP a summary of all USQDs performed since the prior submission. The summary includes USQDs completed six months or more before the October 30 submittal date of the report to DOE Headquarters. (See 10 CFR 830.203(f).)
- 5.10.2 Records & Configuration/Document Control **SHALL** maintain a log of USQDs to ensure proper information collection for the annual USQD report to DOE.

6.0 RECORDS

- 6.1 The following forms, data sheets, logs, reports, or any other form of documentation considered to be a record and generated in response to this procedure shall be prepared, maintained, and transferred to the MRC in accordance with WVDP-262. Refer to Records Inventory and Disposition Schedule (RIDS) for further information.
 - 6.1.1 WV-3306, UNREVIEWED SAFETY QUESTION PROCESS (USQP) FORM.
- 6.2 Records identified in Section 6.1 **SHALL** be maintained with the implementing document (see Attachment A).

7.0 ATTACHMENTS

Attachment A -Matrix of Implementing Procedures
Attachment B -FORM WV-3306, "UNREVIEWED SAFETY QUESTION PROCESS (USQP)"
Attachment C -SAFETY ANALYSIS REPORTS (SARs) and TECHNICAL SAFETY REQUIREMENTS (TSRs)
Attachment D -SAFETY EVALUATION REPORTS (SERs)
Attachment E -USQ PROCESS Flow Chart for the PROPOSED ACTIVITY
Attachment F -USQ PROCESS Flow Chart for the DISCOVERY

Matrix of Implementing Procedures
(Sheet 1 of 2)

Information on "when" to perform a USQ SCREEN is provided in the procedures listed below. Information on "how" to complete USQP FORM WV-3306 is provided in WV-914.

Category	Activity	Implementing Procedure (See Notes 1 & 2.)
<u>DISCOVERY</u>	Occurrence	WVDP-242, Event Investigation and Reporting Manual
	Issue Identification	WVDP-357, WVNS Issues Reporting Program Manual
	Supplier Non-Conformance	QP 4-1, Procurement Document Review
	Non-Conformance	EP-11-001, Startup Test Control
	Other (See Section 4.7.)	WV-914, UNREVIEWED SAFETY QUESTION PROCESS (USQP)
<u>PROPOSED ACTIVITY</u> Design Change	Engineering Change Notice	EP-3-007, Engineering Change Notice
	Test Control	EP-11-001, Startup Test Control
	Experimental and Developmental Test Control	EP-11-003, Experimental and Developmental Test Control
	Work Instructions	EP-5-002, Administration of Work Instruction Packages
	Engineering Release	EP-3-011, Engineering Release of Documents EP-3-028, Design Traveler System
	Temporary Modifications	SOP 00-49, Control of Temporary Modifications
Proposed Change	Controlled Documents	WVDP-257, WVNS Manual for the Preparation, Review, Approval, Distribution, and Revision of Controlled Documents
	Work Instructions	EP-5-002, Administration of Work Instruction Packages
	Issue Identification	WVDP-357, WVNS Issues Reporting Program Manual
	Engineering	WVDP-257, WVNS Manual for the Preparation, Review, Approval, Distribution, and Revision of Controlled Documents
	General Accounting	PROP-1, Preparation, Review, Approval, and Distribution of Property Management Procedures
	Purchase Requisitions	WV-620, Purchase Requisitions and Supplements
New Facility	All facilities requiring SAFETY ANALYSES	WV-365, Preparation of WVDP Safety Documents

Matrix of Implementing Procedures
(Sheet 2 of 2)

NOTES:

1. Instead of the form associated with the particular procedure stating, "Is a USQP FORM WV-3306 attached?", an acceptable equivalent alternative record of decision is provided in WV-914, Section 3.38.
2. The following procedures have an approved USQD EXCLUSION. Therefore, they are no longer required to invoke the requirement of performing a USQ SCREEN during the process of creating or revising the procedures under their control.

ACP 4.1,	<i>Preparation, Approval, and Distribution of PRDs and ACPs</i>
EAD-100,	<i>Preparation and Distribution of Environmental Affairs Departmental (EAD) Procedures</i>
EAD-102,	<i>Preparing and Distributing Procedures for Environmental Regulatory Position Papers</i>
EMP-100,	<i>Preparing and Distributing Procedures for Conducting the Environmental Monitoring Program</i>
EM-100,	<i>Preparing and Reviewing Technical Documents Generated by URS</i>
RC-ADM-1,	<i>Preparation, Review, Approval, and Compliance with Radiation Protection Organization Procedures</i>

Numerous other controlled documents have had a USQD EXCLUSION written per WV-914, Section 5.8. Therefore, changes to those documents no longer require that a USQ SCREEN be performed. Refer to E-Docs to determine if a USQD EXCLUSION exists.

UNREVIEWED SAFETY QUESTION PROCESS (USQP)

USQD #

Page 1 of _____

USQD # is assigned by Records & Configuration/Document Control only for USQDs

I. Information for the [] DISCOVERY or the [] PROPOSED ACTIVITY.

A. Date: B. System #:

C. Description:

D. Document to which this USQP will be attached (e.g., ER, ECN, work instruction, procedure, issue report, memo, J-2 for an occurrence report):

E. Cognizant Manager and Department:

II. USQ SCREEN. (See DOE G 424.1-1, Appendix B, Section B.11.)
Answer all questions in either Section II.A or Section II.B, but not both.

A. DISCOVERY (e.g., Occurrence Report; Deficiency Issue Documentation)

1. Does the facility configuration or operation differ from that described in the existing DOCUMENTED SAFETY ANALYSES listed in WV-914, Attachment C? (See DOE G 424.1-1, Sections 1 and 2.4.)
☐ No
☐ Yes
☐ Maybe
2. Is there reason to believe that the existing DOCUMENTED SAFETY ANALYSES listed in WV-914, Attachment C may not be bounding or may be otherwise inadequate? (See 10 CFR 830.203(d)(4) and DOE G 424.1-1, Section 2.4.)
☐ No
☐ Yes
☐ Maybe

B. PROPOSED ACTIVITY (e.g., ER, ECN, work order)

1. Will the PROPOSED ACTIVITY involve a temporary or permanent change in the facility as described in the existing DOCUMENTED SAFETY ANALYSES listed in WV-914, Attachment C? (See 10 CFR 830.203(d)(1).)
☐ No
☐ Yes
☐ Maybe
2. Will the PROPOSED ACTIVITY involve a temporary or permanent change in the procedures as described in the existing DOCUMENTED SAFETY ANALYSES listed in WV-914, Attachment C? (See 10 CFR 830.203(d)(2).)
☐ No
☐ Yes
☐ Maybe
3. Will the PROPOSED ACTIVITY involve a test or experiment NOT described in the existing DOCUMENTED SAFETY ANALYSES listed in WV-914, Attachment C that might affect safe operations? (See 10 CFR 830.203(d)(3) and DOE G 424.1-1, Section 2.3.)
☐ No
☐ Yes
☐ Maybe
4. Will the PROPOSED ACTIVITY require that a change (i.e., a modification, addition, or deletion) be made to the TECHNICAL SAFETY REQUIREMENTS listed in WV-914, Attachment C? (See DOE G 424.1-1, Section 3.2 and Appendix B, Section B.7.)
☐ No
☐ Yes
☐ Maybe

USQD #

USQP

Page 2 of _____

II. USQ SCREEN. (Concluded)

If the answers to all of the questions in Section II.A or II.B above are "No," then complete Sections III and IV.

If the answer to any of the questions in Section II.A or II.B above is "Yes" or "Maybe," then complete Sections IV, V, VI, and VII.

If the answer to Section II.B.4 above is "Yes" or "Maybe," then DOE approval may be required prior to implementing the PROPOSED ACTIVITY. See WV-365, "Preparation of WVDP Safety Documents," for details.

III. USQ SCREEN Basis and References. (Use of this Section is optional. The SAFETY BASIS DOCUMENTS are listed in WV-914, Attachments C and D. Attach additional pages, if needed.)

IV. USQ SCREEN Conclusion.

A. Conclusion (Select only one conclusion.)

1. The DISCOVERY or the PROPOSED ACTIVITY is such that a USQD is not required per WV-914. []
2. The DISCOVERY or the PROPOSED ACTIVITY is such that a USQD **SHALL** be performed per WV-914. []

The USQD ORIGINATOR **SHALL** provide the completed Sections I, II, III {optional} and IV of USQP FORM WV-3306 to the SAFETY ANALYST who **SHALL** obtain a USQD number from Records & Configuration/Document Control and who **SHALL** complete Sections V, VI and VII of USQP FORM WV-3306.

B. Signoff

1. _____
USQD ORIGINATOR (Signature) (Printed) Date

If this is a USQD EXCLUSION per WV-914, Section 5.8, then only a SAFETY ANALYST **SHALL** sign as the USQD ORIGINATOR.

USQD #

USQP

Page 3 of _____

V. USQD. (See 10 CFR 830.3 and DOE G 424.1-1, Section 3.3 and Appendix A.)

DOCUMENTED SAFETY ANALYSES are listed in WV-914, Attachments C.

- | | |
|---|---|
| A. Could the probability of occurrence of an ACCIDENT previously evaluated in the existing DOCUMENTED SAFETY ANALYSES be increased? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |
| B. Could the consequences of an ACCIDENT previously evaluated in the existing DOCUMENTED SAFETY ANALYSES be increased? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |
| C. Could the probability of occurrence of a malfunction of SAFETY SSCs previously evaluated in the existing DOCUMENTED SAFETY ANALYSES be increased? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |
| D. Could the consequences of a malfunction of SAFETY SSCs previously evaluated in the existing DOCUMENTED SAFETY ANALYSES be increased? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |
| E. Could the possibility of an ACCIDENT of a different type than previously evaluated in the existing DOCUMENTED SAFETY ANALYSES be created? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |
| F. Could the possibility of a malfunction of SAFETY SSCs of a different type than previously evaluated in the existing DOCUMENTED SAFETY ANALYSES be created? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |
| G. Could the MARGIN OF SAFETY as defined in the basis for any TECHNICAL SAFETY REQUIREMENT be reduced? | <input type="checkbox"/> No
<input type="checkbox"/> Yes
<input type="checkbox"/> Maybe |

VI. USQD Basis and References.

This Section **SHALL** justify each of the USQD responses in Section V. It should also include the specific revision of the documents that were reviewed. The SAFETY BASIS DOCUMENTS are listed in WV-914, Attachments C and D. Attach additional pages, if needed.

USQD #

USQP

Page 4 of _____

VII. USQD Conclusion.

A. Conclusion (Select only one conclusion.)

1. The DISCOVERY or the PROPOSED ACTIVITY is not a USQ. []
2. The DISCOVERY is a potential USQ that **SHALL** be reviewed by the RADIATION AND SAFETY COMMITTEE (R&SC). []
3. The PROPOSED ACTIVITY, if implemented, would be a USQ. []

The Cognizant Manager **SHALL** ensure: (1) preparation of a proposed revision to the DOCUMENTED SAFETY ANALYSIS per WV-365 and receipt of DOE approval of it prior to implementation of the PROPOSED ACTIVITY; or (2) modification of the PROPOSED ACTIVITY; or (3) termination of the PROPOSED ACTIVITY. (See 10 CFR 830.203(e).)

B. Signoff

1. _____
SAFETY ANALYST (Signature) (Printed) Date

Concurrence

2. _____
SAFETY ANALYST REVIEWER (Signature) (Printed) Date

USQD #

USQP

Page 5 of _____

VIII. RADIATION AND SAFETY COMMITTEE Review of the USQD.

A. Result of R&SC Review (Select only one conclusion.)

1. The DISCOVERY is not a USQ. []

The R&SC **SHALL** return USQP FORM WV-3306 to the COGNIZANT MANAGER for corrective action, per WV-914, Section 5.5.4.A.

2. It is recommended to the President that the DISCOVERY is a probable USQ, that it may require the evaluation and implementation or continuation of interim operational restrictions and that a report to DOE may be required per WVDP-242, "Event Investigation and Reporting Manual." []

B. Signoff

Chairman, R&SC (Signature)

(Printed)

Date

IX. President's Decision Regarding the USQD.

A. Decision (Select only one conclusion.)

1. The DISCOVERY is not a USQ. []

The President **SHALL** return USQP FORM WV-3306 to the R&SC for further action per WV-914, Section 5.6.2.B.

2. The DISCOVERY is declared an UNREVIEWED SAFETY QUESTION []

at Time:_____

Date:_____

The President **SHALL** ensure that requirements in WVDP-242 to report to DOE are met. (See 10 CFR 830.203(g)(2), 10 CFR 830.203(g)(2), and 10 CFR 830.203(g)(3).)

B. Signoff

President (Signature)

(Printed)

Date

SAFETY ANALYSIS REPORTS (SARs) AND TECHNICAL SAFETY REQUIREMENTS (TSRs)

I. SAFETY ANALYSIS REPORTS (SARs)

SAR annual revisions are performed in accordance with WV-365 and are controlled and distributed per WVDP-257.

1. WVNS-SAR-001 Waste Processing and Support Activities
2. WVNS-SAR-023 Remote-Handled Waste Facility

II. TECHNICAL SAFETY REQUIREMENTS (TSRs)

1. WVDP-146 WVDP Technical Safety Requirements

SAFETY EVALUATION REPORTS (SERs)
(Sheet 1 of 3)

I. Nuclear Regulatory Commission (NRC) SAFETY EVALUATION REPORTS (SERs)

1. Safety Evaluation Report on the Dormant West Valley Reprocessing Facility (January, 1982).
2. Safety Evaluation Related to the West Valley Demonstration Project Principal Design Criteria and Management Organization (April, 1987)--(Safety Evaluation Report corresponding to the analysis prepared on the Project SAR Volume 1).
3. Safety Evaluation Report on the West Valley Demonstration Project Cement Solidification System (August, 1987).
4. Safety Evaluation Report on the West Valley Demonstration Project Supernatant Treatment System (September, 1987).
5. Safety Evaluation Report on the West Valley Demonstration Project Liquid Waste Treatment System (April, 1988).
6. Safety Evaluation Report on the West Valley Demonstration Project Low-Level Waste Drum Cell (January, 1989).
7. Safety Evaluation Report on the West Valley Demonstration Project Supernatant Treatment System - A Review of Safety Analysis Report, Volume III, Part D (WVNS SAR-004, Rev. 6, December, 1991).
8. Letter DW:95:0494, B. A. Mazurowski to W. G. Poulson, "Safety Evaluation Report (SER) on the West Valley Demonstration Project Vitrification Process and High-Level Waste Interim Storage," dated May 12, 1995, transmitting Letter 0631:94:08, G. C. Comfort to T. J. Rowland, "Safety Evaluation Report on the West Valley Demonstration Project Vitrification Process and High-Level Waste Interim Storage," dated May 5, 1995.
9. Letter DW:95:0895, B. A. Mazurowski to W. G. Poulson, "Transmittal of Nuclear Regulatory Commission's (NRC) Review of WVNS-SAR-002, Revision 3," dated September 25, 1995, transmitting Letter 1571:95:08, G. C. Comfort to T. J. Rowland, NRC Review of Safety Analysis Report for Low-Level Waste Processing and Support Activities, WVNS-SAR-002, Revision 3," dated September 13, 1995.
10. Letter DW:96:0663, "Department of Energy Approval of WVNS-SAR-001, Rev. 2, Draft G, 'Safety Analysis Report for Project Overview and General Information,'" dated August 15, 1996, transmitting Letter 1760:95:09, G. C. Comfort to T. J. Rowland, "NRC Review of Safety Analysis Report for Project Overview and General Information, WVNS-SAR-001, Revision 2, Draft G," dated July 26, 1996.

SAFETY EVALUATION REPORTS (SERs)
(Sheet 2 of 3)

11. Letter DW:97:0226, R. B. Provencher to W. G. Poulson, "Department of Energy Approval of WVNS-SAR-012, Rev. 0, Draft C, 'Safety Analysis Report for Fuel Receiving and Storage Facility,'" dated March 20, 1997, transmitting Letter 0036:97:08, G. C. Comfort to T. J. Rowland, "Letter Report Documenting NRC's Review of WVNS-SAR-012, Revision 0, Draft C (TAC No. L30924)," dated February 20, 1997.
12. Letter DW:2000:0565, H. R. Moore to R. R. Campbell, "U.S. Nuclear Regulatory Commission (NRC) Safety Evaluation Report (SER) on the West Valley Demonstration Project (WVDP) Preliminary Safety Analysis Report (PSAR) for the Remote Handled Waste Facility (RHWF)," dated August 4, 2000, transmitting Letter 72990, L. W. Camper to E. A. Lowes, "Safety Evaluation Report on the West Valley Demonstration Project Preliminary Safety Analysis Report for the Remote-Handled Waste Facility," dated July 18, 2000.
13. Letter DW:2002:0029, E. A. Lowes to J. L. Little, "U.S. Department of Energy (DOE) Approval of WVNS-SAR-002, Rev. 8, 'Safety Analysis Report for Low-Level Waste Processing and Support Activities' and WVNS-SAR-002, Addendum 4, Rev. 0, Draft C, 'Safety Analysis Report Addendum for Head End Cell Decontamination and Waste Packaging,'" dated January 22, 2002, transmitting Letter 80396, L. W. Camper to A. C. Williams, "U.S. Nuclear Regulatory Commission Safety Evaluation Report of WVNS-SAR-002, Safety Analysis Report for Low-Level Waste Processing and Support Activities," dated October 26, 2001.
14. Letter DW:2004:0085, T. J. Jackson to R. A. Mellor, "Department of Energy (DOE) Approval of WVNS-SAR-001, Rev. 9, "Safety Analysis Report for Waste Processing and Support Activities," and WVNS-SAR-023, Rev. 1, "Safety Analysis Report for Remote Handled Waste Facility," dated March 2, 2004, transmitting Letter 89938 D. M. Gillen to T. J. Jackson, "U.S. Nuclear Regulatory commission Safety Evaluation Report on the West Valley -Demonstration Project Safety Analysis Report for the Remote-Handled Waste Facility (WVNS-SAR-023, Rev. 1, Draft D)," dated November 7, 2003.

II. Department of Energy (DOE) SAFETY EVALUATION REPORTS (SERs)

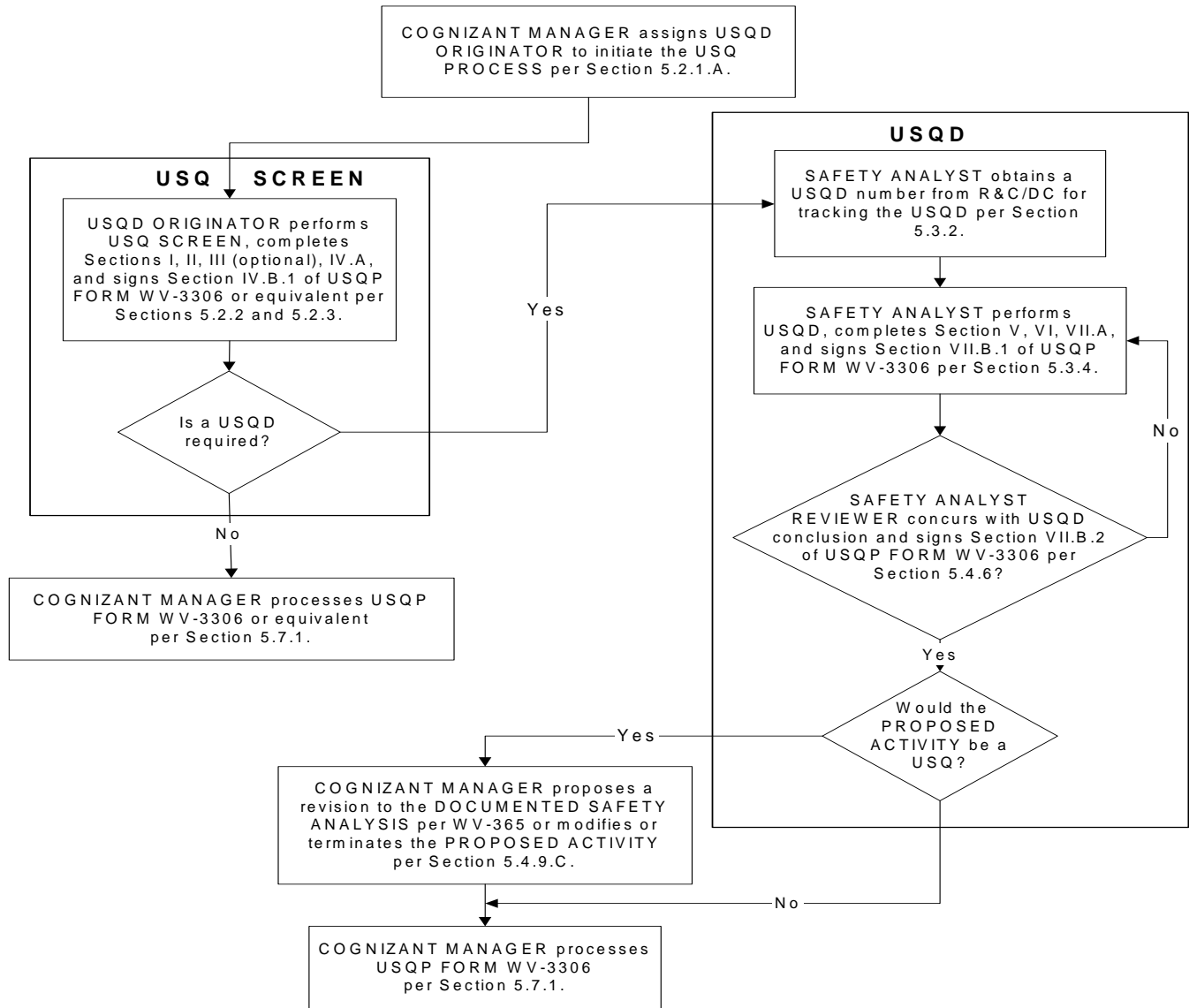
1. Letter DW:2004:0085, T. J. Jackson to R. A. Mellor, "Department of Energy (DOE) Approval of WVNS-SAR-001, Rev. 9, "Safety Analysis Report for Waste Processing and Support Activities," and WVNS-SAR-023, Rev. 1, "Safety Analysis Report for Remote Handled Waste Facility," dated March 2, 2004, transmitting WVDP-SER-001. Rev. 2, "Safety Evaluation Report for Waste Processing and Support Activities and the Remote Handled Waste Facility."

SAFETY EVALUATION REPORTS (SERs)
(Sheet 3 of 3)

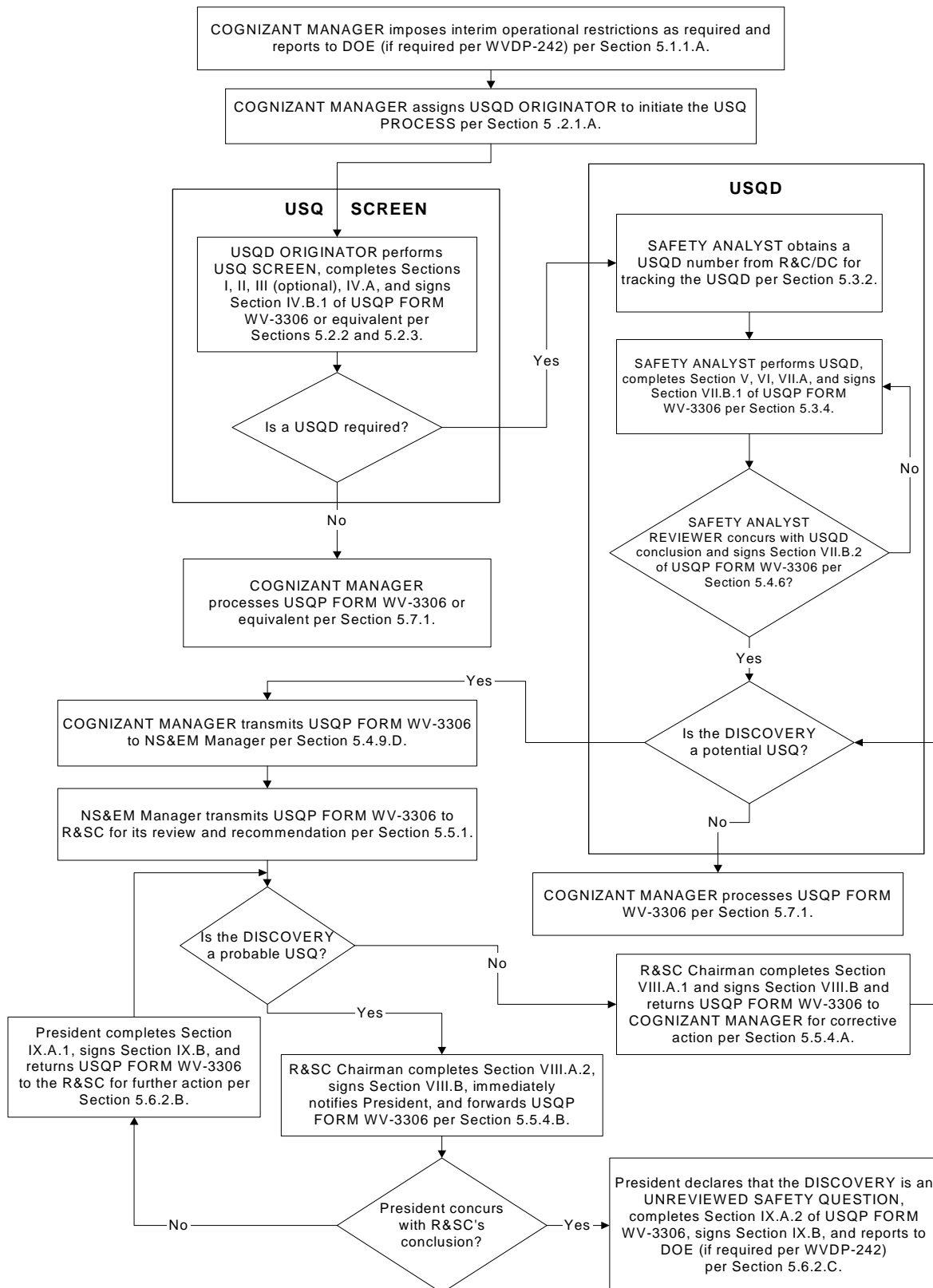
2. Letter DW:2005:0234, J. H. Swailes to R. A. Mellor, "Department of Energy (DOE) Approval of WVNS-SAR-001, Rev. 10, "Safety Analysis Report for Waste Processing and Support Activities," and WVNS-SAR-023, Rev. 2, "Safety Analysis Report for the Remote Handled Waste Facility," dated December 16, 2005 transmitting WVDP-SER-001, Rev. 3, "Safety Evaluation Report for Waste Processing and Support Activities and the Remote Handled Waste Facility."

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USQ PROCESS Flow Chart for the PROPOSED ACTIVITY



USQ PROCESS Flow Chart for the DISCOVERY



WVNSCO RECORD OF REVISION

Rev. No.	Description of Changes	Revision On Page(s)	Dated
22	General Revision In order to implement the requirements of DOE Rule 10 CFR 830.203, "Unreviewed Safety Question Process," many definitions, some procedural steps, and most references to DOE requirements and guidance documents were changed. Updated organization names. Updated list of SARs and SERs. Added Waste Management Program and Fire Protection Program to list of SAFETY MANAGEMENT PROGRAM POLICY STATEMENTS in Attachment E. All USQD ORIGINATORS, Nuclear Safety & Emergency Management, and all WVDP managers are affected. DOE approval contained in Letter DW:2001:0854, dated 12/17/01 and Letter DW:2002:0029, dated 01/22/02.	All All All 30, 32, 33 36, 38	02/28/02
23	Revised document to reflect issuance of DOE Guide 424.1-1, dated 10/24/01. Added note that DOE has authorized WVNS to make organizational or other editorial changes to WV-914 without prior DOE approval and added citation of Letter DW:2001:0854. Deleted reference to WV-987 in Section 3.2 Updated location of the list of USQD ORIGINATORS. Updated information on USQD annual report. Updated Attachment A to reflect the implementing procedure changes. Referred to Section 4.38 for the equivalent alternative record of decision. All USQD ORIGINATORS and Nuclear Safety & Emergency Management are affected.	All 1 3 11, 12, 14 20 22 23	04/11/02
24	Revised document to implement the consolidated DSA, WVNS-SAR-001, Revision 8, and to make minor editorial changes. Deleted reference to WV-987 in 1.0 Revised title of WVNS-SAR-001 in Attachment C Deleted WVNS-SAR-002, -003, and -012 from Attachment C.	1 30 30	11/13/02

WVNSCO RECORD OF REVISION CONTINUATION FORM

Rev. No.	Description of Changes	Revision On Page(s)	Dated
24 Cont.	Deleted superceded SER references and added reference letter for WVDP-SER-001, Revision 1 approving WVNS-SAR-001, Revision 8 Updated to reflect organizational changes DOE approval for this revision is contained in DW:2002:0500, dated October 18, 2002, and DW:2001:0854, dated December 17, 2001. This revision affects Facility Managers, USQD Originators, and NS&EM.	32 all	
25	Revised format to comply with DCIP-100; sections renumbered accordingly; updated text section references; updated text sections as required to incorporate information from deleted SCOPE, RESPONSIBILITIES, & FORMS sections Updated Requirements Deleted NE-1 Memo & RM-3 from references; Added WVDP-146; Changed WV-602 to EP-5-003 Clarified definitions 3.2 and 3.7 Deleted POLICY STATEMENT definition Deleted reference to WV-906 section # in 3.18 Revised definition of SAFETY MANAGEMENT PROGRAM Deleted old section 4.7 Updated text and attachments listed in 4.10 Added 5.2.1.B Deleted "USQ" from last line of 5.3.1; Added 5.3.1.A & B.; updated attachments in 5.3.3 Deleted 5.3.4.C.4) Added 5.4.1.A Deleted ref. to DOE G 424.1-1 in 5.4.9.B 2) Deleted "new-type" from 5.8 Added "via internal correspondence" to 5.8.4 Added 5.10.2 Updated Attachments listed in 7.0 Updated Attachment A Revised Attachment B to delete question in II.B.5. Form WV-3306 Updated Attachments C and D Deleted old Attachment E, SAFETY MANAGEMENT PROGRAM POLICY STATEMENTS; flow charts updated; attachments re-lettered	1 2 3 4 5 6 8 8 9 10 11 12 13 17 17 18 18 19 21 26-28 29-30	03/12/04

DOE Approval of this revision is contained in DW:2004:0105, dated March 11, 2004.

This revision affects Facility Managers, USQD Originators, R&C/DC, and NS&EM.

WVNSCO RECORD OF REVISION CONTINUATION FORM

Rev. No.	Description of Changes	Revision On Page(s)	Dated
26	Corrected WV-3306 to remove obsolete instructions for USQ Screen question II.B.5. This question was deleted in previous revision. DOE approval is not required for editorial changes as authorized in DW:2001:0854. This revision affects USQD Originators, Safety Analysts and NS&EM.	22	10/12/04
27	Added reference to WVDP-111 to Sect. 2.2 Corrected reference "Section 4.9" to "Section 4.8" in paragraph 5.7.1.B. Reworded paragraph 5.10.1 for clarity Added reference to letter DW:2005:0234 dated December 16, 2005 which approved WVDP-SAR-001, Rev. 10 and WVDP-SAR-023, Rev. 2 and transmitted WVDP-SER-001, Rev. 3 to WVNSCO. This revision affects USQD Originators, Safety Analysts, and NS&EM.	2 16 18 29	01/17/06